

**Ackerman, Joyce**

---

**From:** Patrick Medland <PMedland@Geosyntec.com>  
**Sent:** Tuesday, July 10, 2018 10:34 AM  
**To:** Ackerman, Joyce  
**Cc:** Jonathan H. Steeler; Dave Folkes; Richard Dean; Stovall - CDPHE, Curtis  
**Subject:** Neuhauser Landfill - Final Report Table of Contents  
**Attachments:** Neuhauser LF TOC with comments.doc

Dear Joyce,

In an effort to make sure the Final Report for the Neuhauser Landfill site includes all documentation you expect, I have drafted an outlined and annotated table of contents that is attached to this email. The last page includes the requirements I found in the AOC and Drum Removal Work Plan. When you get the chance, please take a look and let me know if you have any comments or questions. You can reach me by email or phone, whichever is easier.

Also a quick update on the three 55-gallon drums containing IDW from well installation activities that occurred prior to the execution of the AOC – we expect Waste Connections to confirm today as to when they will pick up and haul these drums across the street to the Front Range Landfill.

Thanks,  
Patrick

Patrick Medland  
Scientist

Geosyntec Consultants  
5670 Greenwood Plaza Blvd Ste 540  
Greenwood Village, CO 80111

Office: 303-790-1340  
Direct: 720-509-8907

*Prepared for*

Stratus Redtail Ranch, LLC  
**Neuhauser Landfill,**

**Weld County, Colorado**

**Draft Final Report - Drum Removal Plan conducted  
pursuant to Administrative Settlement Agreement  
and Order on Consent for Removal Actions CERCLA  
Docket No. CERCLA-08-2018-0002**

*Prepared by*

**Geosyntec**<sup>®</sup>  
consultants

engineers | scientists | innovators

5670 Greenwood Plaza Blvd., Suite 540  
Greenwood Village, Colorado 80111

Project Number DE0302

SUBMISSION DATE

## TABLE OF CONTENTS

1. Executive Summary
2. Summary of Events
  - a. Site Location, Conditions, and History
  - b. Initial Response
  - c. Drum Removal
    - i. Phase 1
    - ii. Phase 2A
    - iii. Phase 2B
    - iv. Phase 3
    - v. Other locations
  - d. Soil and Sludge Excavation
    - i. Phase 1
    - ii. Phase 2A
    - iii. Phase 2B
    - iv. Phase 3
  - e. Test Pits
3. Work Completed
  - a. List of Completed Activities
  - b. Resources Committed
  - c. Analytical Results
    - i. Drum and Soil/Sludge Characterization
    - ii. Confirmation Sampling
    - iii. Liquid
    - iv. Air
  - d. Disposal of Waste
    - i. Off-site
    - ii. Onsite
  - e. Variances to Work Plan

**Commented [1]:** Copy and Paste from DRWP – Figures 1 and 2 referenced

**Commented [2]:** Reference DRWP as Appendix A for additional information

**Commented [3]:** Chronological narrative of drums excavated by month and drums removed from site by month. Include quantity of types of material (solid – soil, sludge, refuse – or liquid) and #s. Reference Table 1 and Figures 3-X

**Commented [4]:** Chronological narrative of soils excavated by month and soils removed from site by month. Include quantity of material.

**Commented [5]:** Brief narrative of actions in the field. Include Appendix B

**Commented [6]:** Summary of below. Include Table 2 and appendices C and D

**Commented [7]:** Good faith estimates of total cost or statement of actual costs incurred in complying with the settlement. Include Appendix E.

**Commented [8]:** Tables 3-x and appendix F

**Commented [9]:** Include text on locations of removed materials and provide total amounts of drums and material managed. Include IDW water (frac tanks), PPE, etc. Include all shipping papers and manifests (Appendix G). Include discussion of disposal and removal options considered.

**Commented [10]:** Include fundamental changes from DRWP based upon site work

i. Difficulties Encountered

ii. Changes Enacted

Commented [11]: Appendix H

4. Recommendations and Further Plans

a. SWMP

Commented [12]: Appendix I

b. Recommendations for Further Work at the Site

## TABLES

Table 1: Drum Removal Log

Table 2: Waste Shipments

Tables 3-X: Analytical Results Summaries

**Commented [PM13]:** To include amounts (volume, weight, number as applicable) of drums, stockpiled soils, roll-offs, and other waste removed from the site. Also to include receiving facility, treatment methods, waste codes, and numbers of shipments.

## FIGURES

Figure 1: Site Location Map

Figure 2: Site Plan

Figures 3-X: Maps during excavation

**Commented [PM14]:** Including master table of sample names, times, dates, and what was sampled

**Commented [PM15]:** To document initial and final conditions at the site and some interim statuses

## APPENDICES

Appendix A: Drum Removal Work Plan

Appendix B: Test Pit Figures and Tables and GPR Study

Appendix C: Photolog

Appendix D: DFRs

Appendix E: Bills and Invoices

Appendix F: EDDs of Analytical Data

Appendix G: Shipping Papers and Manifests

Appendix H: Approved Variances to the Drum Removal Work Plan

Appendix I: Storm Water Management Plan

#### Requirements from AOC

1. Conform with Section 300.165 of the NCP
  - a. Situation as it developed
  - b. Actions Taken
  - c. Resources committed
  - d. Problems encountered
2. Good faith estimate of total costs or statement of actual costs
3. a listing of quantities and types of materials removed off-Site or handled on-Site
4. a discussion of removal and disposal options considered for those materials
5. a listing of the ultimate destination(s) of those materials
6. a presentation of the analytical results of all sampling and analyses performed
  - a. Include all EDDs
7. accompanying appendices containing all relevant documentation generated during the removal action (e.g., manifests, invoices, bills, contracts, and permits).

Also – see note in AOC regarding spatial data (28.b(2))

Also – see note in AOC regarding file name (28.b(3))

#### Requirements from the DRWP

- A list of completed activities and a certification that each has been completed in accordance with approved plans.
- Digital color photographs with a written description.
- Tabular summary of analytical results.
- Site sketches/maps showing initial conditions, status of work at interim milestones, and the final Site conditions. The final map shall include the analytical data that corresponds to the areas that soil excavation/disposal occurred
- Legible copies of shipping papers and manifests of all off-site shipments of hazardous and non-hazardous wastes
- Tabular summary of wastes shipments. The summary shall include but not be limited to the following: total weight per waste stream, final disposal facility for each waste, treatment methods applied to each waste, state and Federal waste codes assigned (if any), and the total number of shipments
- Deliverables will be provided in the formats required by the AOC